



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EAG/TH/MEF
F. #2018R01021

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 22, 2019

By ECF

The Honorable I. Leo Glasser
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Amato, et al.
Criminal Docket No. 19-442 (ILG)

Dear Judge Glasser:

The government respectfully writes to request that the enclosed stipulation and order concerning certain discovery materials be so-ordered by the Court. The proposed stipulation and order concerns discovery materials that contain personal financial information and personally identifiable information regarding individuals other than the defendants ("PII") and draft transcripts. The government makes this application because there is a significant amount of discovery materials, which contain PII, and draft transcripts yet to be produced to the defense and it believes that the proposed stipulation will enable expedited

production of those materials. The proposed stipulations and orders, which have been signed by all parties, in counterparts, are respectfully enclosed for the Court's consideration.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: _____/s/
Elizabeth Geddes
Megan E. Farrell
Tanya Hajjar
Assistant U.S. Attorneys
(718) 254-6430/6448/6109

cc: Defense Counsel (by ECF)